IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

Geneva Reed-Veal, Individually and as	§	
Mother and Personal Representative of	§	
the Estate of Sandra Bland, deceased,	§	
Plaintiffs,	§	
	§	
V.	§	Civil Action No. 4:15-cv-02232
	§	
Brian Encinia, et al.,	§	
Defendants.	§	Jury

DEFENDANTS TEXAS DEPARTMENT OF PUBLIC SAFETY AND BRIAN ENCINIA'S NOTICE OF INITIAL DISCLOSURE

Defendants Texas Department of Public Safety and Brian Encinia, through undersigned counsel, advise the Court that they have complied with FRCP 26(a)(1) by providing their initial disclosures to all parties of record on this date.

Respectfully submitted,

KEN PAXTON Attorney General of Texas

CHARLES E. ROY First Assistant Attorney General

JAMES E. DAVIS Deputy Attorney General for Civil Litigation

KAREN D. MATLOCK Chief, Law Enforcement Defense Division

/s/ Seth Byron Dennis SETH BYRON DENNIS Assistant Attorney General Attorney-in-charge State Bar No. 00790580 Southern District Bar No. 18527 P. O. Box 12548, Capitol Station Austin, Texas 78711 (512) 463-2080 phone (512) 495-9139 fax

Attorneys for Defendant Texas Department of Public Safety and Trooper Encinia

Notice of Electronic Filing

I, Seth Byron Dennis, Assistant General of Texas, do hereby certify that I have electronically submitted for filing, a true and correct copy of the above and foregoing **Defendants Texas Department of Public Safety and Brian Encinia's Notice of Initial Disclosure** in accordance with the Electronic Case Files System of the Southern District of Texas, on this the 15th day of September, 2015.

/s/ Seth Byron Dennis SETH BYRON DENNIS Assistant Attorney General

Certificate of Service

I, Seth Byron Dennis, Assistant Attorney General of Texas, do hereby certify that a true and correct copy of the above and foregoing **Defendants Texas Department of Public Safety and Brian Encinia's Notice of Initial Disclosure** has been served by hand delivery on this 15th day of September, 2015, to the following counsel of record:

Jesse Thomas Rhodes III TOM RHODES LAW FIRM, P.C. 126 Villita St. San Antonio, TX 78205 Counsel for Plaintiffs

Larry Simmons, Jr.
GERMER GERTZ, L.L.P.
P.O. Box 4915
Beaumont, TX 77704
Counsel for Waller County Defendants

/s/ Seth Byron Dennis SETH BYRON DENNIS Assistant Attorney General